VIA ECFS

Marlene H. Dortch, Esq. Secretary Federal Communications Commission Office of the Secretary 445 Twelfth Street, S.W., Room TW-A325 Washington, D.C. 20554

Re: In re Applications of AT&T Inc. & Deutsche Telekom AG for Consent to Assign or Transfer Control of Licenses & Authorizations, WT Dkt No. 11-65 – Objection to Disclosure of Stamped Confidential Documents, Stamped Highly Confidential Documents, NRUF and LNP Data, and Other Confidential and Highly Confidential Information to Michael S. Flaherty, Shailahb Atal, and Daniel Hays

Dear Ms. Dortch:

Pursuant to the Protective Orders for the AT&T/T-Mobile USA proceeding, AT&T Inc. ("AT&T"), Deutsche Telekom AG ("Deutsche Telekom"), and T-Mobile USA, Inc. ("T-Mobile"; collectively with AT&T and Deutsche Telekom, "Applicants") object to the Acknowledgments of Confidentiality ("Acknowledgments") filed in the above-referenced docket on May 6, 2011 on behalf of Michael S. Flaherty, Manager; Shailahb Atal, Principal; and Daniel Hays, Director, (collectively, "Management Consultants") of PRTM Management Consultants ("PRTM"). Management Consultants are represented to be Outside Consultants to Sprint Nextel Corporation ("Sprint"). To date, Applicants have notified Sprint's counsel that Applicants have cleared 21 Outside Counsel (including non-attorney staff) and 20 Outside Consultants across Sprint's multiple law firms and consulting groups. Thus, out of the 44 sets of Acknowledgments

¹ In re Applications of AT&T Inc. & Deutsche Telekom AG for Consent to Assign or Transfer Control of Licenses & Authorizations, WT Dkt No. 11-65, Second Protective Order, DA 11-753 (WTB rel. Apr. 27, 2011); In re Applications of AT&T Inc. & Deutsche Telekom AG for Consent to Assign or Transfer Control of Licenses & Authorizations, WT Dkt No. 11-65, NRUF/LNP Protective Order, DA 11-711 (WTB rel. Apr. 18, 2011); In re Applications of AT&T Inc. & Deutsche Telekom AG for Consent to Assign or Transfer Control of Licenses & Authorizations, WT Dkt No. 11-65, Protective Order, DA 11-674 (WTB rel. Apr. 14, 2011) (collectively, "Protective Orders").

² See Letter from Regina M. Keeney, Lawler, Metzger, Keeney & Logan, LLC, to Marlene H. Dortch, Esq. (May 6, 2011).

³ Undefined capitalized terms have the meanings supplied in the Protective Orders.

Marlene H. Dortch, Esq. May 11, 2011 Page 2

filed on behalf of Sprint's Outside Counsel and Outside Consultants, Applicants have objected to only three. Applicants object to Management Consultants for the simple reason that they are engaged in Competitive Decision-Making and, thus, are ineligible to access Confidential and Highly Confidential Information (including NRUF/LNP Confidential Information) under the Protective Orders.

As Outside Consultants, Management Consultants may not be "involved in Competitive Decision-Making." The Protective Orders state that "'Competitive Decision-Making' means that a person's activities, association, or relationship with *any of its clients* involve advice about or participation in the relevant business decisions or the analysis underlying the relevant business decisions of the client in competition with or a business relationship with the Submitting Party."⁵

Yet, that is precisely what Management Consultants do. "PRTM's focus is helping companies find new and innovative ways to operate to achieve strategic advantage." According to its website, "PRTM's telecom consulting teams have deep experience in both mature and emerging telecom markets. Our value-chain approach and global experience enable us to deliver bottom-line results."

In addition, the company markets itself as follows:

- "Since 1976, PRTM has created a competitive advantage for its clients by changing the way companies operate. PRTM management consultants work with senior executives to develop and implement innovative operational strategies that deliver breakthrough results. The firm is a leader in operational strategy, supply chain, product development, and customer value management."
- "Strategic Consulting Services for Innovation Management: In the quest for business leadership, companies face a host of unprecedented challenges: slower adoption of new products, drastically reduced access to capital, increased commoditization of numerous technology offerings, and the emergence of nimble new competitors. For some companies, the existing business model is no longer sustainable. That's where PRTM comes in. Since our founding in 1976, we have

 $^{^4}$ Second Protective Order \P 2; NRUF/LNP Protective Order \P 4; Protective Order \P 2.

⁵ Second Protective Order ¶ 2 (emphasis added); NRUF/LNP Protective Order ¶ 4 (emphasis added); Protective Order ¶ 2. (emphasis added).

⁶ Exhibit A. All exhibits are printouts made on May 11, 2011 from PRTM's website, http://www.prtm.com/. More specific URL addresses are provided when helpful.

⁷ Exhibit B.

⁸ Exhibit C.

been helping organizations strategically innovate their operations to drive lasting competitive advantage."

- "PRTM's focus is helping companies find new and innovative ways to operate to achieve strategic advantage. Our clients depend on it. PRTM has followed one, single principle since our founding in 1976: to make a lasting difference for our clients. Our management consultants get results by working relentlessly and passionately as a global team—partnering with senior executives to create and execute innovative operational strategies that deliver top-line growth, maximum earnings, and peak valuation." ¹⁰
- "Our firm offers insight into transforming the very way your company operates. We create a competitive advantage by living and breathing your business, your operations, and your ecosystem. What does this mean? At PRTM, our management consultants look at the big picture: Our focus spans your entire value network, including customers, investors, suppliers, regulators, and key stakeholders. We dig deeper and farther, beyond the obvious, with a proven combination of the latest strategic thinking, experience across a broad array of market segments, and a team of experts collaborating around the world." 11
- "PRTM's operational strategy consulting helps our clients achieve superior business results. We are also a leader in global supply chain management, product and service development, and customer value management—the operational areas that allow a company to execute its business strategy flawlessly. In fact, over the last decade, PRTM management consulting engagements have represented a total ROI of more than 200:1—resulting in more than \$300 billion in value creation for clients."
- "Companies that rewrite the rules put themselves on the map and achieve unprecedented performance. *PRTM's forward-thinking management consultants create operational strategies that provide companies with competitive advantage.*" ¹³
- "You want to win, making the headlines not just in your industry, but across the entire ecosystem in which you compete. *PRTM's management consultants know*

⁹ Exhibit D (emphasis added).

¹⁰ Exhibit A (emphasis added).

¹¹ *Id.* (emphasis added).

¹² *Id.* (emphasis added).

¹³ Exhibit E (emphasis added).

Marlene H. Dortch, Esq. May 11, 2011 Page 4

how to define and shape your operational strategy to give you a competitive advantage so you hit the mark in your industry—and beyond."¹⁴

• "That's because innovation is truly defined where your business operates: on the factory floor, on retail shelves, in distribution centers, in customer care centers, and in labs and engineering centers. And that's what makes PRTM different. We don't just rattle off empty buzzwords. We follow through—putting strategies into action. Let PRTM help you refine, transform, and change your operations with breakthrough innovations that yield dramatically improved results." ¹⁵

The biographies of Messrs. Atal and Hays highlight how they advise on and participate in the business decisions of their service provider, equipment manufacturer, technology, and media clients:¹⁶

- "Shailabh Atal is a Principal in the Services, Electronics & Software business group at PRTM. Atal has over 10 years of experience working with service providers, equipment manufacturers, and high-technology companies across various geographies Americas, Europe, Asia, Middle East and Africa. *His experience focuses on business and operational strategy and turnaround, complex program execution, and process re-engineering.*" ¹⁷
- "Dan Hays is a director in the Services, Electronics & Software business group at PRTM. Dan works with service providers, equipment manufacturers, software companies, and media firms worldwide. His experience focuses on business and operational strategy, product development management, operational improvement, and organizational effectiveness." 18

-

¹⁴ Exhibit F (emphasis added).

¹⁵ PRTM Management Consulting, Firm Brochure, at 2, http://www.prtm.com/uploadedFiles/Our_Firm/Background/PRTM_brochure.pdf?n=579 9 (last visited May 11, 2011) (Exhibit G).

¹⁶ We were unable to locate a biography for Mr. Flaherty. But, given the generally applicable descriptions of PRTM's work that are plastered all over its website, Applicants have no reason to believe that Mr. Flaherty is any less involved in Competitive Decision-Making.

¹⁷ PRTM Featured Blog: Tech & Telecom Blog, Author Information, http://www.prtm.com/Blog.aspx?blogauthor=Shailabh%20Atal&id=3916&langtype=1033 (last visited May 11, 2011) (Exhibit H).

¹⁸ PRTM Featured Blog: Tech & Telecom Blog, Author Information, http://www.prtm.com/Blog.aspx?blogauthor=Dan%20Hays&id=3916&langtype=1033 (last visited May 11, 2011) (Exhibit I).

Marlene H. Dortch, Esq. May 11, 2011 Page 5

These excerpts from PRTM's website leave no doubt that Management Consultants are engaged in Competitive Decision-Making. Knowledge of the business plans, finances, subscriber information, and other Confidential and Highly Confidential Information of Applicants – and other carriers to whose NRUF/LNP Confidential Information Management Consultants also seek access – would unfairly advantage PRTM's clients at the expense of Applicants, other carriers, and the public interest in fair competition.

For these reasons, Applicants object to Management Consultants' Acknowledgments of Confidentiality and respectfully ask the Commission to dismiss or deny them.

Respectfully submitted,

/s/ Peter J. Schildkraut

Peter J. Schildkraut Arnold & Porter LLP 555 Twelfth Street, N.W. Washington, D.C. 20004 202-942-5634

Counsel for AT&T Inc.

/s/ Nancy J. Victory

Nancy J. Victory
Wiley Rein LLP
1776 K Street, N.W.
Washington, D.C. 20006
202-719-7344

Counsel for Deutsche Telekom AG and T-Mobile USA, Inc.

Attachments

cc: Attached Service List





RELATED CONTENT

Firm Brochure

THOUGHT LEADERSHIP

EXPERTISE

OUR FIRM

CAREERS

Our Firm / Overview

Overview

Values & Culture

Leadership

Newsroom

Events

Alumni

Locations

Contact Us

Overview

We Relentlessly Pursue Results

PRTM's focus is helping companies find new and innovative ways to operate to achieve strategic advantage. Our clients depend on it.

PRTM has followed one, single principle since our founding in 1976: to make a lasting difference for our clients. Our management consultants get results by working relentlessly and passionately as a global team—partnering with senior executives to create and execute innovative operational strategies that deliver top-line growth, maximum earnings, and peak valuation.

Our firm offers insight into transforming the very way your company operates. We create a competitive advantage by living and breathing your business, your operations, and your ecosystem. What does this mean? At PRTM, our management consultants look at the big picture: Our focus spans your entire value network, including customers, investors, suppliers, regulators, and key stakeholders. We dig deeper and farther, beyond the obvious, with a proven combination of the latest strategic thinking, experience across a broad array of market segments, and a team of experts collaborating around the world.

PRTM's operational strategy consulting helps our clients achieve superior business results. We are also a leader in global supply chain management, product and service development, and customer value management—the operational areas that allow a company to execute its business strategy flawlessly. In fact, over the last decade, PRTM management consulting engagements have represented a total ROI of more than 200:1—resulting in more than \$300 billion in value creation for clients.

Our management consulting teams serve major industry and public sectors from 19 locations worldwide. To learn more about our management consulting services, contact us at info@prtm.com.

Read PRTM overview in another language:

Danish | Dutch | Finnish | French | Hindi Italian | Korean | Marathi | Norwegian | Polish | Portuguese Russian | Spanish | Swedish | Taiwanese | Turkish

See also PRTM's web sites in Chinese | German | Japanese

PRTM - Where Innovation Operates











THOUGHT LEADERSHIP

EXPERTISE

OUR FIRM

CAREERS

Expertise / Industry Sectors / Telecommunications

Industry Sectors

Aerospace & Defense

Automotive

Chemicals & Process Industries

Consumer Goods & Retail

Electronics

Energy

Health Care

Industrial

Private Equity

Public Sector

Software

Telecommunications

Capabilities

Services

Performance Measurement

Industry Sectors

Telecommunications

In developed and developing markets alike, telecommunication service providers are under pressure to drive profitability and growth while staying relevant to customer needs.

After a wave of solid market growth, service providers in mature markets are finding it increasingly difficult to retain customers and maintain market leadership. Meanwhile, in emerging markets, opportunity abounds, as leading providers benefit from increased deregulation and attention from investors.

No matter the market, customers demand seamless, reliable, and ubiquitous communications—at the lowest possible cost. These users are pushing telecommunications companies to introduce **inventive operating models** and deliver innovative offerings.

Your path forward

To meet these demands, service providers must revisit their business and operational models:

Providers in mature markets must reduce costs while managing the advent of next-generation technologies and the new services critical to differentiation.

Providers in emerging markets must expand their offerings and enter new market segments while acquiring more mature practices in **product and service development**, network deployment, service operations, and **supply chain management**.

How we can help

PRTM's telecom consulting teams have deep experience in both mature and emerging telecom markets. Our value-chain approach and global experience enable us to deliver bottom-line results.

For more information about our telecom consulting services, please contact us at info@prtm.com.

POINT OF VIEW

"PRTM's wireless practice is one of the best in the industry. They have a genuine strategic view of the wireless space, and a very strong team of professionals to support their clients."

lan Sugarbroad President and CEO, LGC Wireless

ARTICLES & CASE STUDIES

Android—Friend or Foe?

The 3G/4G Business Case for Emerging Markets

Read More Articles & Perspectives

Read PRTM's Tech & Telecom Blog

PRTM - Where Innovation Operates













THOUGHT LEADERSHIP

EXPERTISE

OUR FIRM

CAREERS

Our Firm / Newsroom / Press Kit

Overview

Values & Culture

Leadership

Newsroom

In the News

Press Releases

Press Kit

Worldwide Media Contacts

Events

Alumni

Locations

Contact Us

Press Kit

Information About PRTM

About PRTM

Since 1976, PRTM has created a competitive advantage for its clients by changing the way companies operate. PRTM management consultants work with senior executives to develop and implement innovative operational strategies that deliver breakthrough results. The firm is a leader in operational strategy, supply chain, product development, and customer value management. PRTM has 19 offices worldwide and serves major industry and global public sectors.

Staff and Locations

PRTM has over 600 consultants based in **locations** across North America, Europe, the Middle East, and Asia.

Capabilities

We help our clients develop operational strategies for:

Acquisitions and alliances

Asset utilization

Breakthrough products

Cost structure

Customer loyalty

Global presence

Operational clockspeed

Organizational change

Regulatory change

Sustainability

Top-line growth

Practice Focus

Our core practice areas are:

Operational strategy

Product innovation

Supply chain innovation

Customer experience innovation

Enterprise co-creation

Industry Sectors We Serve

Aerospace and defense

Automotive

Chemicals and process industries

Consumer goods and retail

Electronics

Energy and utilities
Financial services
Health Care
Industrial
Private equity
Public sector
Software
Telecommunications

PRTM - Where Innovation Operates

















THOUGHT LEADERSHIP

EXPERTISE

OUR FIRM

CAREERS

Expertise / Services

Industry Sectors

Capabilities

Services

Operational Strategy
Product & Service Innovation
Supply Chain Innovation

Customer Experience Innovation

Enterprise Co-Creation

Performance Measurement

Services

Strategic Consulting Services for Innovation Management

Companies are facing the most challenging market in history

In the quest for business leadership, companies face a host of unprecedented challenges: slower adoption of new products, drastically reduced access to capital, increased commoditization of numerous technology offerings, and the emergence of nimble new competitors. For some companies, the existing business model is no longer sustainable. That's where PRTM comes in. Since our founding in 1976, we have been helping organizations strategically innovate their operations to drive lasting competitive advantage.

PRTM management consultants provide these services

Operational Strategy
Product & Service Innovation
Supply Chain Innovation
Customer Experience Innovation
Enterprise Co-Creation

For more information about optimizing your business operations, please contact us at info@prtm.com.

ARTICLES & CASE STUDIES

Arrow Electronics Drives Competitive Advantage and Growth

Getting Off the Roller Coaster

How FedEx Uses Insight and Invention to Innovate

Innovation: A Survival Handbook

PRTM - Where Innovation Operates



















THOUGHT LEADERSHIP

EXPERTISE

OUR FIRM

CAREERS

Expertise / Capabilities

Industry Sectors

Capabilities

Acquisitions & Alliances
Asset Utilization
Breakthrough Products
Cost Structure
Customer Loyalty
Global Presence
Operational Clockspeed
Organizational Change
Regulatory Change
Sustainability
Top-Line Growth

Services

Performance Measurement

Capabilities



Industry Leaders Use Operational Management to Create Off-the-Charts Performance

Companies that rewrite the rules put themselves on the map and achieve unprecedented performance. PRTM's forward-thinking management consultants create operational strategies that provide companies with competitive advantage.

PRTM Offers Our Clients a Wide Range of Capabilities in These Areas

Acquisitions & Alliances Asset Utilization Breakthrough Products Cost Structure Customer Loyalty Global Presence Operational Clockspeed Organizational Change Regulatory Change Sustainability Top-Line Growth

Related Services

Choose a related service area below

ARTICLES & CASE STUDIES

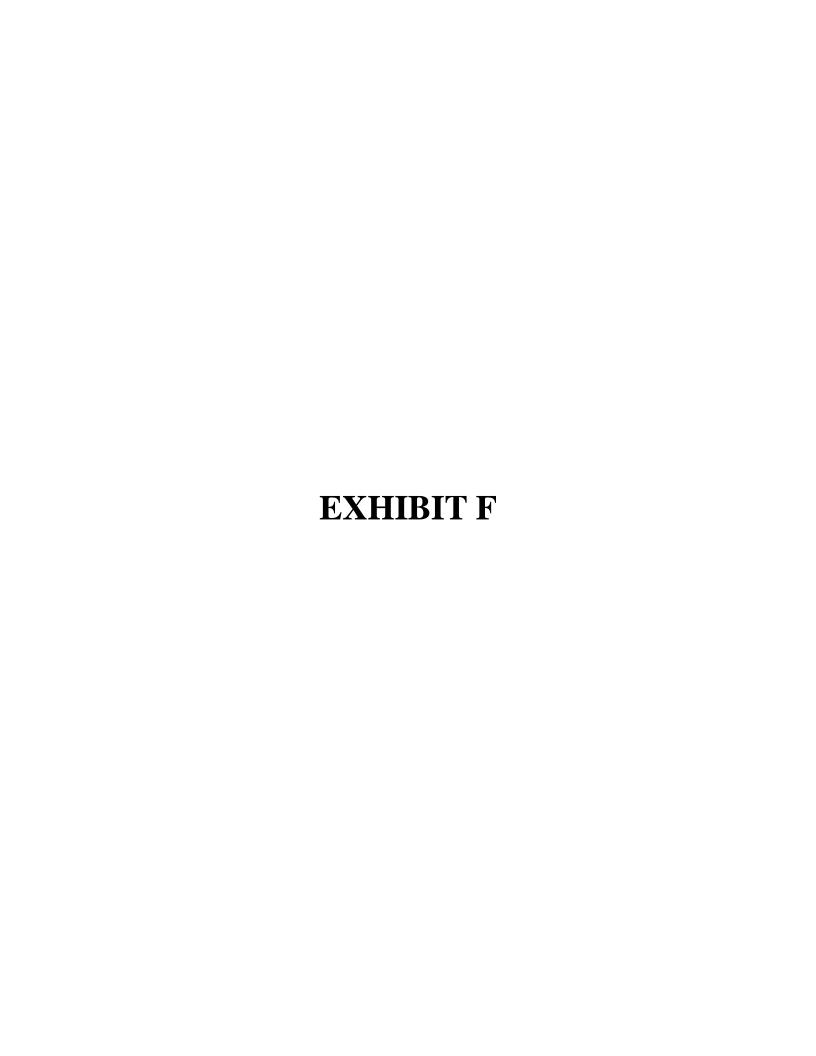
Arrow Electronics Drives Competitive Advantage and Growth

Guiding Global Growth

How FedEx Uses Insight and Invention to Innovate

Report by Economist Intelligence Unit—Global Disruptors: Steering through the Storms

PRTM - Where Innovation Operates





CONTACT US















Management Consultants

THOUGHT LEADERSHIP

EXPERTISE

OUR FIRM

CAREERS

Expertise / Industry Sectors

Industry Sectors

Aerospace & Defense

Automotive

Chemicals & Process Industries

Consumer Goods & Retail

Electronics

Energy

Health Care

Industrial

Private Equity

Public Sector

Software

Telecommunications

Capabilities

Services

Performance Measurement

Industry Sectors



ARTICLES & CASE STUDIES

New Operational Strategy Helps Uncover \$600 Million in Savings

Innovation: A Survival Handbook

Taming Turbulence

Make Headlines Through Innovation Management

You want to win, making the headlines not just in your industry, but across the entire ecosystem in which you compete. PRTM's management consultants know how to define and shape your operational strategy to give you a competitive advantage so you hit the mark in your industry—and beyond.

PRTM's Management Consultants Serve These Industry Sectors

Aerospace & Defense
Automotive
Chemicals & Process Industries
Consumer Goods & Retail
Electronics
Energy
Health Care
Industrial
Private Equity
Public Sector
Software

Telecommunications

PRTM - Where Innovation Operates





By Any Definition, PRTM is Where Innovation Operates

Innovation — it's the lofty-sounding word on the lips of virtually every CEO today. But the real definition of innovation can't be found in boardrooms. You can't find it on white boards. You can't find it in reports. That's because innovation is truly defined where your business operates: on the factory floor, on retail shelves, in distribution centers, in customer care centers, and in labs and engineering centers.

And that's what makes PRTM different. We don't just rattle off empty buzzwords. We follow through—putting strategies into action. Let PRTM help you refine, transform, and change your operations with breakthrough innovations that yield dramatically improved results.

PRTM / purpose

experts in operational strategy

2. Seasoned consultants who help clients implement transformational ideas that achieve demonstrable measurable, meaningful results—v. To collaborate with clients to create and execute operational strategies that result in game-changing operational innovations. See also: Foresight, Ingenuity, Perspective, Results



PRTM is Foresignt

Operational Strategy is Corporate Strategy

Face it: Sooner or later, dynamic businesses in dynamic industries encounter decisive inflection points. Market opportunities—or competitive threats—emerge. Change happens. Of course, most CEOs can identify those change points. What separates the winners from the losers is the *foresight* to see beyond the horizon, anticipate change, and implement game-changing operational strategies that tangibly move your business to entirely new levels of success.

Our clients aren't content to merely respond to change. They want to take charge by proactively creating operational innovations—sustainable, fundamental shifts in how they operate—that challenge conventional wisdom and transform their business. Operational innovations drive the measurable results that CEOs care most about: EBITDA, shareholder value, market share, customer experiences, productivity, time to market, and quality.

PRTM MARKETS

\$300 BILLON in value creation

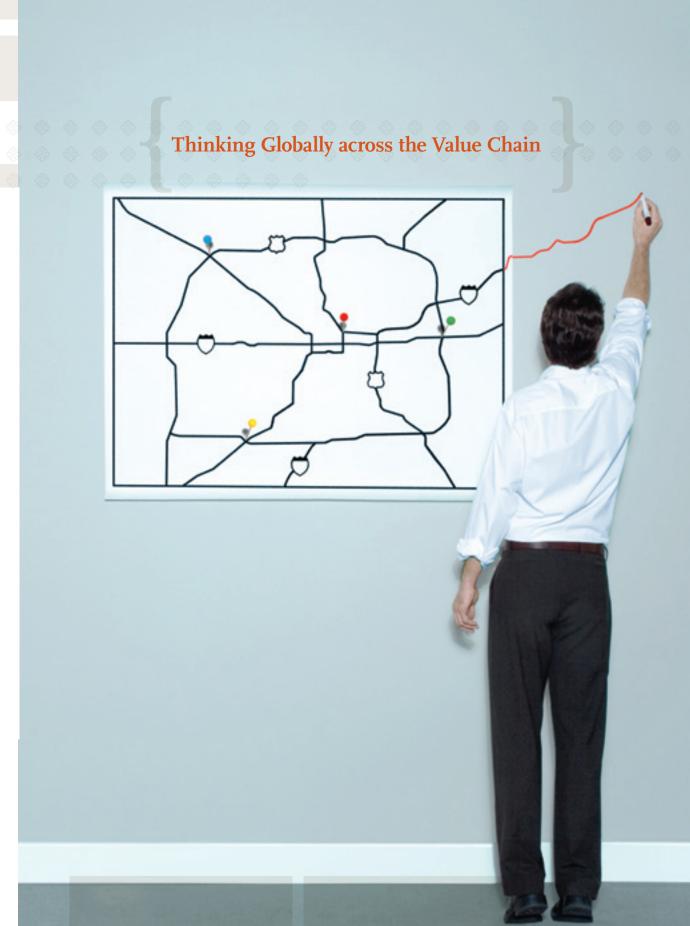
In the last decade, PRTM consultants have helped clients respond to opportunities that drive dramatic revenue increases and breakthrough cost reductions. *Collectively, these engagements represent a total ROI of more than 200:1.*

AEROSPACE & DEFENSE AUTOMOTIVE CONSUMER GOODS ENERGY FINANCIAL SERVICES GOVERNMENT INDUSTRIAL PUBLIC SECTOR SOFTWARE

PRTM is Perspective

Too many consulting firms are in a great rush to stress their "expertise in your standing of the forces and challenges you industry." Sure, at first glance, that might sound relevant. But at PRTM, we approach things from a different perspective to give you a wider, more holistic view. We recognize that, just as no man is an island, no company exists in isolation. More than ever, companies operate in virtual "ecosystems"—value chains of complementary partners, suppliers, regulators, investors, and other stakeholders.

PRTM brings a fuller, deeper underface; recognizing the impact to and from the wider value chain extending outside your walls, outside your industry category, and into the broader market sector. We give you a new perspective to see and respond to the intersections of the different ecosystem players. That's one way PRTM helps you achieve meaningful, sustainable breakthroughs.





PRTM applies its unique expertise to a full range of fundamental management challenges: innovation, customer value, and profitability. This vision enables our clients to achieve and sustain measurable operational growth.



PRTM assembles diverse teams from across the globe that thoroughly recognize the critical forces driving today's global ecosystems.



nately, the world isn't segmented quite that challenge across your company. neatly—and your business shouldn't be either. Companies face pan-business challenges that impact end-to-end processes that reach across artificial department barriers.

Underpinning every PRTM engagement is one simple but powerful principle: The way your company operates—the way you implement and execute your corpo- corporate accountability. rate strategy—is the path toward creating sustainable business advantage. This understanding—knowing how to do what needs to be done—is in PRTM's corporate DNA,

It's an understandable instinct: The typical infusing and inspiring every client engageconsulting firm rushes to zero in on ment. At PRTM, we apply uncommon inge-"marketing problems," "sales problems," nuity to devise and implement innovative or "manufacturing problems." Unfortu- operational strategies that address the entire

> So, for example, while a product-quality issue traditionally implies transforming a manufacturing process, we see-and show you—how it also affects other areas of your company: from purchasing raw materials and product design to customer service, organizational structure, and

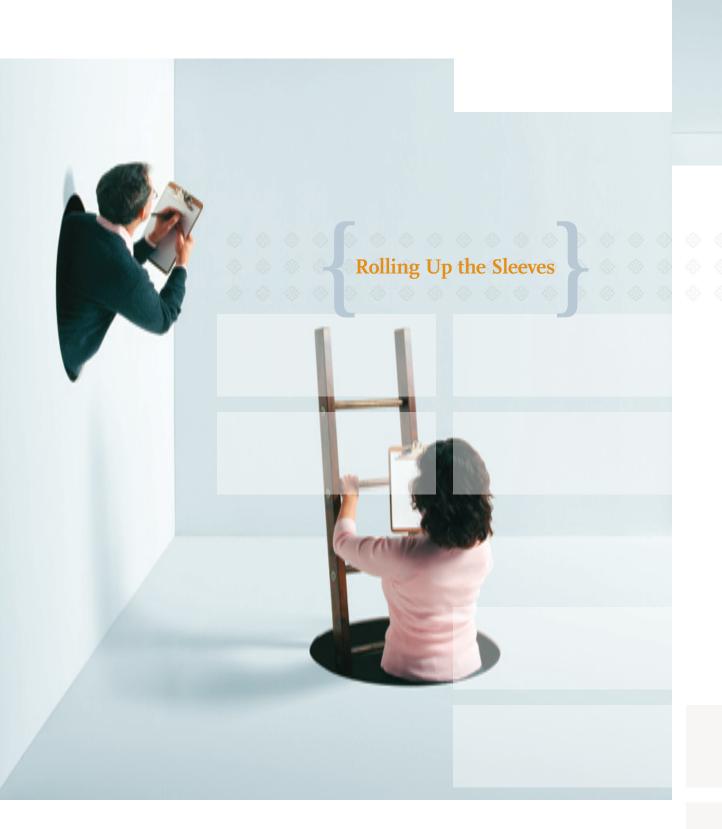
To

PRTM partners work alongside staff consultants and clients. You're always working with an owner. The benefit: a blend of accountability, experience, and cost-effectiveness.

PRTM CONSULTANTS POSSESS A

REMARKABLY DIVERSE COLLECTION OF
INDUSTRY BACKGROUNDS AND EXPERIENCES.

ADMIRAL BIOCHEMIST PHYSICIAN PROFESSOR SCIENTIST





Immersed

It's the quiet secret that most consulting firms don't want to admit: All the flow charts, diagrams, schedules, matrices, methodologies, and frameworks in the world won't move the needle one bit. It takes much more: a passionate commitment to roll up the sleeves and get actively involved alongside your team to implement your operational strategy.

Traditional management consultants look at the big picture—and stop. PRTM keeps drilling right down to the nitty-gritty details that make the differ-

ence between success and failure. Our teams have one of the industry's lowest ratios of consultants to partners—on average 4:1—emphasizing a collaborative approach that marshals the resources of our firm with the active involvement of our seasoned firm owners. We work onsite as part of the team alongside your employees, helping you bring your business to entirely new levels of success—without the egos and the attitude.



PRTM is Results

What does it all mean to you—and what really matters? Ultimately, the only way to judge a consulting firm is on the meaningful and measurable results it achieves for your business. That's where PRTM shines. We help you break out of old paradigms, outdated processes, and confining assumptions to collaboratively transform how your business operates—with foresight, perspective, ingenuity, and deep commitment. If your business requires a response to change—or if you want to *seize new opportunities*—let PRTM help you turn your operations into a competitive advantage.

Bengaluru

+91 80.4010.0900

Boston

+1 781.434.1200

Chicago

H 847.430.9000

Dallas

+1 972.980.8200

Detroit

+1 248.327.250C

Frankfurt

+49 69.219.940

Glasgow

+44 141.616.2616

London

+44 1235 555500

Munich

-49 89.516.175.5

New York

212.915.2600

Orange County

+1 949.752.0100

Paris

+33 0.1.56.68.30.3c

Shanghai

+86 21.2890.9662

Silicon Valley

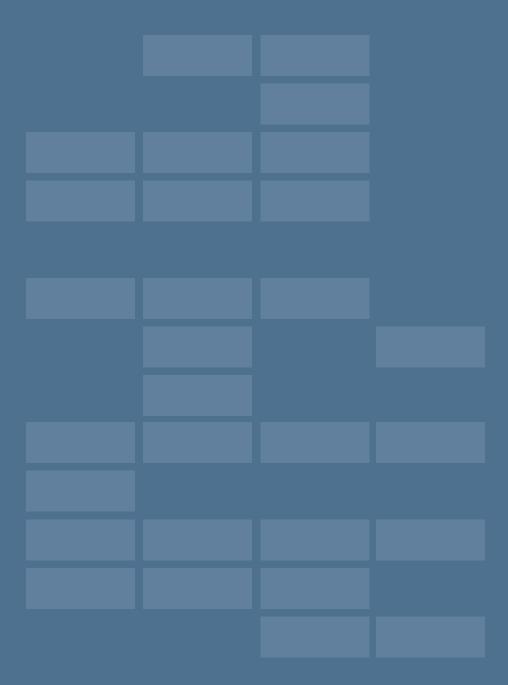
-1 650.967.290c

Tokyo

-81 3.5326.9090

Washington, DC

+1 202.756.1700



















THOUGHT LEADERSHIP

EXPERTISE

OUR FIRM

CAREERS

Thought Leadership / Featured Blog: Tech & Telecom



AUTHOR INFORMATION

Shilabh Atal



Shailabh Atal is a Principal in the Services, Electronics & Software business group at PRTM. Atal has over 10 years of experience working with service providers, equipment manufacturers, and high-technology companies across various geographies – Americas, Europe, Asia, Middle East and Africa. His experience focuses on business and operational strategy and turnaround, complex program execution, and process re-engineering. Prior to joining PRTM, Atal led the development of various telecommunications and wireless products for Lucent Technologies while working at Wipro Technologies and Lightbridge (now a unit of Visa). Atal holds an Electronics and Communications degree from Netaji Subhas Institute of Technology at the University of Delhi, India, and an MBA from the Ross School of Business at the University of Michigan. He can be reached at satal@prtm.com.

AUTHOR'S MOST RECENT POSTS

Mar 08, 2011

Why 4G Fails to Attract Consumers

Verizon's 4G LTE network—which promises broadband data speed over a wireless connection— was launched with much fanfare in the United States, but hasn't yet caught on with customers. Clearwire's 4G WiMAX network similarly has proved unsuccessful in moving consumers toward mass adoption of 4G. Why have these networks failed to excite analysts and consumers? Consumers are confused by the plethora of "Gs." 3G, 4G, WiMAX, HSPA+— these often poorly-defined network technology acronyms are not resonating with the mass market. Consumers care less about the acronym and more about the experience. Telecom industry executives seem to understand that; otherwise...

Questions? Contact Shailabh Atal, PRTM Principal, at satal@prtm.com

Blog Home

ABOUT THIS BLOG

PRTM consultants share their views on the latest operational innovations in the high-tech and telecommunications industry.

SUBSCRIBE TO THIS BLOG

RECENT POSTS

The Economics of HD Voice (0)

AT&T: Turning the Possible Into Reality (3)

comment: Sahil, good points and some of them are significant from such an...

Software Updates: Lessons from iTunes to Improve Customer Experience (1)

comment: The beauty of itunes, on top of the benefits you described, is t...

Voice Over LTE: Balancing Technology Choices with Commercial Imperatives (0)

Four Keys to Implementing 4G Strategies (1)

comment: good

Hyperscale Data Centers—5 Points to Consider When Choosing a Server Vendor

The End of an Era: Selling T-Mobile USA to AT&T (0)

Why 4G Fails to Attract Consumers (3)

comment: Recently I had the opportunity to lead a market entry analysis a...

Cell Towers in Emerging Markets: Four Factors To Watch (0)

Software Development

Compliance Controls: Four Principles to Reduce Risk and Improve Quality (0)

VIEW BY CATEGORY

Select Category

MEET THE AUTHORS

Select an Author

ARCHIVE

Apr 2011 | Mar 2011 | Feb 2011 | Jan 2011 | Dec 2010 | Nov 2010 | Oct 2010 | Sep 2010 | Aug 2010 | Jul 2010 | Jun 2010

More From PRTM

Perspective: Broadband Beyond Borders

Released in March, the Federal Communications Commission's (FCC) first ever National Broadband Plan envisions the future of U.S. broadband communications. Whether customers are urban or rural, consumer or business, wireline or wireless, the plan will affect all Americans... **More**

Mobile Broadband: Three Reasons to Be Hopeful

Though it has been adopted by some 200 million subscribers in just a couple of years and technology-wise it has proved successful, a lot can still be done to take mobile broadband to the masses in a profitable way for operators... **More**

Article: Managing Risk in Disruptive Times

As the current economic turmoil demonstrates, the global business landscape is increasingly vulnerable to disruptive forces with the potential to drastically affect companies' operations and performance. A recent Economist Intelligence Unit / PRTM survey revealed what top companies are doing to mitigate the risks these disruptions pose and to create new sources of competitive advantage... **More**

PRTM - Where Innovation Operates

















THOUGHT LEADERSHIP

EXPERTISE

OUR FIRM

CAREERS

Thought Leadership / Featured Blog: Tech & Telecom



AUTHOR INFORMATION

Dan Hays



Dan Hays is a director in the Services, Electronics & Software business group at PRTM. Dan works with service providers, equipment manufacturers, software companies, and media firms worldwide. His experience focuses on business and operational strategy, product development management, operational improvement, and organizational effectiveness. A prolific author, speaker, and widely-cited industry expert, Dan's writing includes leading thinking on the wireless industry, growth strategies, and the management of innovation. Prior to joining PRTM, Dan worked for Intel and IBM in marketing and product development. Dan holds an Electrical Engineering degree from the Georgia Institute of Technology and an MBA from Harvard Business School. He can be reached at dhays@prtm.com.

AUTHOR'S MOST RECENT POSTS

Apr 04, 2011

Four Keys to Implementing 4G Strategies

Wireless service providers around the world are debating their options and grappling with how to fund the costly build-out of 4G wireless networks. The recent announcement of AT&T's acquisition of T-Mobile USA puts an even finer point on the question— how will wireless service providers change the way they operate to better compete in a rapidly consolidating marketplace? Last August I outlined seven key financial and structural options for service providers to fund 4G, each with unique and significant implications for these companies' operational strategies and go-to-market approaches. In this entry, I share my thoughts on how to structure the...

Nov 05, 2010

The Coming of MVNO 3.0

The recent introduction of white-label branded communications services in the U.S. by major retailers Best Buy and Wal-Mart may mark the first crumbling in an avalanche of change in the wireless industry. While past attempts at creating mobile virtual network operator (MVNO) business models have largely failed, there is good reason to believe that the wireless service providers of tomorrow could look more like these new entrants than today's wireless network owners/operators. The first generation of MVNOs was spawned during an era of regulatory concerns and rapid growth in the wireless industry. They struggled to compete with the very network...

Aug 27, 2010

Feeding and Funding the 4G Habit

Blog Home

ABOUT THIS BLOG

PRTM consultants share their views on the latest operational innovations in the high-tech and telecommunications industry.

SUBSCRIBE TO THIS BLOG

RECENT POSTS

The Economics of HD Voice (0)

AT&T: Turning the Possible Into Reality (3)

comment: Sahil, good points and some of them are significant from such an...

Software Updates: Lessons from iTunes to Improve Customer Experience (1)

comment: The beauty of itunes, on top of the benefits you described, is t...

Voice Over LTE: Balancing Technology Choices with Commercial Imperatives (0)

Four Keys to Implementing 4G Strategies (1)

comment: good

Hyperscale Data Centers—5 Points to Consider When Choosing a Server Vendor

The End of an Era: Selling T-Mobile USA to AT&T (0)

Why 4G Fails to Attract Consumers (3)

comment: Recently I had the opportunity to lead a market entry analysis a...

Cell Towers in Emerging Markets: Four Factors To Watch (0)

Software Development

As wireless service providers anticipate 4G network deployment, many are grappling with how to fund the costly build-out of this latest technology. With the 4G business case still unproven, it's increasingly clear that few can fully afford to overlay existing networks with 4G's higher speeds. Based on discussions with wireless industry leaders around the world, I see seven sources from which wireless operators can potentially fund their 4G habit. The right solution will depend on each operator's starting point, risk tolerance, and business strategy. 1. Organic funding—Following the traditional wireless model, this option funds the build-out of...

Aug 04, 2010

Six Reasons to Believe in Mobile Payments

Recent reports that U.S. mobile leaders AT&T, Verizon, and T-Mobile USA are teaming up to transform mobile phones into payment devices stimulate fascinating visions of what the future of mobile payments might look like. While the outcome of this particular venture is unclear, mobile payments represent an important opportunity for mobile service providers to strengthen and broaden their customer relationships. Here are six reasons to believe that mobile payments may be the next big thing for the wireless industry. 1. Customer intimacy—Unlike credit cards, mobile devices share an intimate association with consumers. Mobile phones hold our contact...

Jul 23, 2010

Harbinger of Wireless Innovation

The recent announcement of the LightSquared nationwide broadband wireless network plan may signal a breakthrough in U.S. wireless history. Financially backed by Harbinger Capital Partners, LightSquared is viewed by some telecom industry pundits and the financial media as a risky bet. Bets aside, LightSquared may well be in the right place at the right time to capitalize on the future of mobile communications. LightSquared plans to construct a nationwide wholesale network that will enable incumbent wireless operators, wireline service providers—and any organization with a consumer relationship, brand, or vision—to offer wireless broadband...

Jul 07, 2010

Who Will Win the Smartphone OS Race?

The highly-charged opening weekend for sales of the iPhone 4 is the latest blow in the smartphone operating system (OS) battle. As Om Malik commented in his widely-read GigaOm blog, "The Android camp is doing its very best to counter what seems like a monster launch from Apple." But are the Apple iOS and the Google Android operating system the only real contenders in the war for the winning OS? In this encounter a clear winner will not be determined by conventional terms. Typical advantages—being first-to-market, having the largest installed customer base and the highest-quality and most-reliable product—have become practically...

Jun 23, 2010

High Tech Industry Leadership for BP in the Gulf Oil Spill Disaster

The ongoing oil spill crisis in the Gulf of Mexico is likely to end up in the history books as one of the world's greatest environmental disasters. Unlike many disasters, however, blame for the accident has fallen squarely on the shoulders of a single company, BP. And, while the company's initial response to the oil spill was led by its CEO, long-time energy company executive Tony Hayward, BP has more recently turned to leadership approaches and lessons learned from the high tech industry to help chart a course through the crisis. As reported in CNN's recent profile of BP's Chairman,...

Questions? Contact Dan Hays, PRTM Director, at dhays@prtm.com

Compliance Controls: Four Principles to Reduce Risk and Improve Quality (0)

VIEW BY CATEGORY

Select Category

MEET THE AUTHORS

Select an Author

ARCHIVE

Apr 2011 | Mar 2011 | Feb 2011 | Jan 2011 | Dec 2010 | Nov 2010 | Oct 2010 | Sep 2010 | Aug 2010 | Jul 2010 | Jun 2010

More From PRTM

Perspective: Broadband Beyond Borders

Released in March, the Federal Communications Commission's (FCC) first ever National Broadband Plan envisions the future of U.S. broadband communications. Whether customers are urban or rural, consumer or business, wireline or wireless, the plan will affect all Americans... **More**

Mobile Broadband: Three Reasons to Be Hopeful

Though it has been adopted by some 200 million subscribers in just a couple of years and technology-wise it has proved successful, a lot can still be done to take mobile broadband to the masses in a profitable way for operators... **More**

Article: Managing Risk in Disruptive Times

As the current economic turmoil demonstrates, the global business landscape is increasingly vulnerable to disruptive forces with the potential to drastically affect companies' operations and performance. A recent Economist Intelligence Unit / PRTM survey revealed what top companies are doing to mitigate the risks these disruptions pose and to create new sources of competitive advantage... **More**

PRTM - Where Innovation Operates

CERTIFICATE OF SERVICE

I hereby certify that on this eleventh day of May, 2011, I caused true and correct copies of the foregoing to be served by electronic mail (to Best Copy and Printing, Inc. and the FCC staff members listed below) and by hand delivery (to Ms. Keeney) upon:

Best Copy and Printing, Inc. 445 Twelfth Street, S.W. Room CY-B402 Washington, D.C. 20554 FCC@BCPIWEB.COM

Kathy Harris, Esq.
Mobility Division
Wireless Telecommunications Bureau
Federal Communications Commission
1250 Maryland Avenue, S.W.
Room 6329
Washington, D.C. 20554
kathy.harris@fcc.gov

Ms. Kate Matraves
Spectrum and Competition Policy Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Room 6528
Washington, D.C. 20554
catherine.matraves@fcc.gov

Jim Bird, Esq.
Office of General Counsel
Federal Communications Commission
445 Twelfth Street, S.W.
Room 8-C824
Washington, D.C. 20554
jim.bird@fcc.gov

Regina M. Keeney, Esq. Lawler, Metzger, Keeney & Logan, LLC 2001 K Street, N.W. Suite 802 Washington, D.C. 20006

/s/ Shelia Swanson

Shelia Swanson Senior Legal Assistant Arnold & Porter LLP